

THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	NO. 13-30052-MJR
)	
JEREMIAH DORAI JACOB,)	
)	
Defendant.)	

STIPULATION OF FACTS

Comes now James L. Porter, Acting United States Attorney for the Southern District of Illinois and Norman R. Smith, Assistant U.S. Attorney for this District and herewith enter into the following Stipulation of Facts with the defendant, Jeremiah Dorai Jacob, represented by his attorney Justin A. Kuehn, pertaining to the relevant conduct of the defendant within the scope of U.S.S.G. §1B1.3.

1. On or about August 31, 2012, in St. Clair County, within the Southern District of Illinois, Jeremiah Dorai Jacob, in Case No. 12-CR-30038-MJR, entitled *United States v. Jeremiah Dorai Jacob*, was sentenced to serve fourteen months imprisonment in the Bureau of Prisons, to be followed by three years supervised release and was ordered to pay restitution to victims of his offense in the amount of \$241,630.95. On that date he was released pursuant to chapter 207 of Title 18, United States Code, while awaiting surrender for service of sentence after conviction and was ordered to voluntarily surrender on March 15, 2013 to the designated Bureau of Prisons institution. The defendant was notified at sentencing that should he fail to surrender he could be prosecuted for Failure to Appear.

2. On September 13, 2012, the defendant requested permission to travel to Australia to work to earn additional funds to pay restitution to the victims of his offense. On September 13, 2012, the District Court granted the defendant's motion to travel to Australia but ordered the defendant to return to the United States of America prior to March 15, 2013.

3. On or about September 19, 2012, the United States Marshals Service for the Southern District of Illinois notified the defendant that he was ordered to surrender to authorities at the Northeast Ohio Correctional Center in Youngstown, Ohio on March 15, 2013 by 1:00 p.m. to begin serving his sentence. The notification further informed the defendant that if he failed to report that he could be cited for contempt of court.

4. On March 15, 2013, Jeremiah Dorai Jacob, did knowingly and willfully fail to surrender for service of sentence as ordered by the court, in Case No. 12-CR-30038-MJR, entitled *United States v. Jeremiah Dorai Jacob*, for a violation of Title 15, United States Code, Sections 77e(a) and 77x, an offense punishable by imprisonment for a term of five years or more, and having been directed by the court to surrender to the United States Bureau of Prisons, CI NE Ohio Corr Ctr, 2240 Hubbard Rd., Youngstown, OH on March 15, 2013 by 1:00 p.m. in the Northern District of Ohio.

5. On March 18, 2013, Jeremiah Dorai Jacob, sent an email to his federal pretrial services officer indicating that it was not his intention to return to the United States to serve his sentence.

6. Jeremiah Dorai Jacob was arrested in Australia on June 19, 2014, pursuant to the United States' request for extradition and has been detained pending these proceedings.

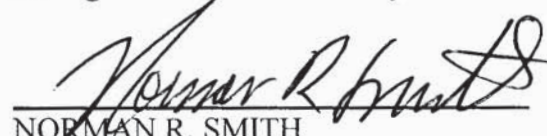
7. Jeremiah Dorai Jacob was ordered extradited to serve any remaining part of his sentence in Case No. 12-CR-30038-MJR and ordered extradited for prosecution of Count 1,

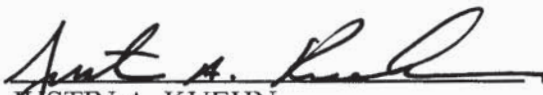
Failure to Surrender for Service of a Sentence, in this cause. He was not extradited as to Count 2, Criminal Contempt of Court, and therefore the United States will request that Count 2 be dismissed with prejudice.

SO STIPULATED:

JAMES L. PORTER
Acting United States Attorney


JEREMIAH DORAI JACOB
Defendant


NORMAN R. SMITH
Assistant United States Attorney


JUSTIN A. KUEHN
Attorney for Defendant

Date: 5/11/2016

Date: 5/11/2016